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8 *Attorneys for Complainant*

9 **BEFORE THE**
10 **BOARD OF REGISTERED NURSING**
11 **DEPARTMENT OF CONSUMER AFFAIRS**
12 **STATE OF CALIFORNIA**

13 In the Matter of the Accusation Against:

Case No.

2010-666

14 **LOLA TOKUNBO OBANWO**

ACCUSATION

15 1198 Coventry Avenue
16 Clovis, CA 93611

17 Registered Nurse License No. 722341

Respondent.

18 Louise R. Bailey, M.Ed., RN ("Complainant") alleges:

19 **PARTIES**

20 1. Complainant brings this Accusation solely in her official capacity as the Interim
21 Executive Officer of the Board of Registered Nursing, Department of Consumer Affairs.

22 **License History**

23 2. On or about March 7, 2008, the Board of Registered Nursing issued Registered Nurse
24 License Number 722341 ("license") to Lola Tokunbo Obanwo ("Respondent"). The license will
25 expire on July 31, 2011, unless renewed.

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1 **FIRST CAUSE FOR DISCIPLINE**

2 **(Criminal Conviction)**

3 9. Respondent is subject to disciplinary action under Code section 2761, subdivision (f),
4 in that on or about May 20, 2009, in the Superior Court of California, County of Fresno, in the
5 case entitled, *People of the State of California v. Lola Takunbo Obanwo* (Superior Ct. Fresno
6 County, 2009, Case No. F09900871), Respondent was convicted on her plea of no contest of
7 violating Penal Code section 245, subdivision (a)(1) (Assault With a Deadly Weapon), a felony.
8 The circumstances of the crime are that on or about February 9, 2009, Respondent did willfully
9 and unlawfully commit an assault upon V.L. and R.L. with a deadly weapon, to wit, a blunt
10 object. Such crime is substantially related to the qualifications, functions, and duties of a
11 registered nurse.

12 **SECOND CAUSE FOR DISCIPLINE**

13 **(Unprofessional Conduct)**

14 4. Respondent is subject to disciplinary action under Code section 2761, subdivision (a),
15 in that Respondent committed acts constituting unprofessional conduct, as set forth in paragraph
16 9, above.

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PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Revoking or suspending Registered Nurse License Number 722341 issued to Lola Tokunbo Obanwo;

2. Ordering Lola Takunbo Obanwo to pay the Board the reasonable costs of the investigation and enforcement of this case, pursuant to Code section 125.3; and,

3. Taking such other and further action as deemed necessary and proper.

DATED: 6/28/10

Louise R. Bailey
LOUISE R. BAILEY, M.ED., RN
Interim Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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